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March 5, 2019

**VIA ECF & E-MAIL**

The Honorable Shelley C. Chapman  
United States Bankruptcy Judge  
Southern District of New York  
One Bowling Green  
New York, New York 10004  
Jamie\_Eisen@nysb.uscourts.gov  
SCCChambers@nysb.uscourts.com

Re: *In re: Lehman Brothers Holdings, Inc. v. 1st Advantage Mortgage, LLC, et al.*,  
Adv. Proceeding No. 16-01019-SCC  
*In re: Lehman Brothers Holdings, Inc. v. Hartland Mortgage Centers, LLC*  
Adv. Proceeding No. 16-01317-SCC  
Adv. Proceeding No. 18-01800-SCC

Dear Judge Chapman:

I write on behalf of the above-referenced client to respectfully request that the Court schedule a brief *in chambers* conference on Thursday March 7, 2019, after the status conference scheduled in the above-referenced adversary proceeding on that same date. The purpose is to discuss the Plan Administrator's unwillingness to resolve its claims against Hartland, an entity that has been defunct for over four years, as encouraged by Your Honor on June 12, 2018.<sup>1</sup> I have enclosed a list of issues and supporting confidential financial information via email as requested by your honor from a prior in chambers discussion. However, due to its confidential nature I will not be placing the Exhibits in the public record.

Respectfully submitted,

/S/ Tracy L. Henderson  
Tracy L. Henderson, Esq

cc: LBHI's Counsel (via ECF)  
Exhibit 1: LBHI Issues and Hartland Responses  
Exhibits A-L: Supporting Financial Documentation

<sup>1</sup> Excerpts from the June 12, 2018 Transcript have been previously provided in this matter.